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12 and ON CHAIN INNOVATIONS, LLC

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

11 HIDDEN EMPIRE HOLDINGS, LLC;
12 a Delaware limited liability company;
13 HYPER ENGINE, LLC; a California
14 limited liability company; DEON
15 TAYLOR, an individual,

16 Plaintiffs,
17 v.

18 DARRICK ANGELONE, an
19 individual; AONE CREATIVE, LLC
20 formerly known as AONE
21 ENTERTAINMENT LLC, a Florida
22 limited liability company; ON CHAIN
23 INNOVATIONS, LLC, a Florida
24 limited liability company,

25 Defendants.

Case No. 2:22-cv-06515-MWF-AGR
Action Filed: September 12, 2022

Assigned to Honorable
Judge Michael W. Fitzgerald

**DECLARATION OF SANDRA
CALIN REGARDING TRANSFER
OF THE NINE “ICELANDIC
DOMAINS”**

DATE: April 9, 2024
TIME: 9:00am
DEPT: 5A

I, Sandra Calin, declare as follows:

1. I am an attorney at law duly licensed to practice before all courts of the
State of California and am a partner with the law firm of Kramer, deBoer & Keane,
LLP, attorneys of record for Defendants DARRICK ANGELONE, AONE
CREATIVE, LLC and ON CHAIN INNOVATIONS, LLC (“Defendants”) in the
above-captioned case.

1 2. I have personal knowledge of the following facts and, if called upon as
2 a witness, could competently testify thereto, except as to those matters which are
3 explicitly set forth as based upon my information and belief and, as to such matters, I
4 am informed and believe that they are true and correct.

5 3. Following the Status Conference held on April 2, 2024, I participated in
6 a telephone conference with Erin Burke of FTI, counsel for Plaintiffs Stephanie Jones
7 Nojima, and Sean Merrick, regarding transfer of four of the “Icelandic domains” that
8 are at issue in this litigation.

9 4. During the telephone conference, Mr. Merrick was provided with the
10 named used by Roxanne Taylor to register the domains, and the domains were
11 transferred to her by Mr. Merrick. Following the telephone conference, Ms. Nojima
12 confirmed by email that the domains had been transferred.

13 5. During the hearing on April 2, 2024, counsel for Plaintiffs Lawrence
14 Hinkle confirmed that of the total of nine of the “Icelandic domains,” five were in fact
15 unregistered and in the public domain, and Ms. Taylor was able to register them. With
16 the transfer of the remaining four domains by Mr. Merrick, all nine of the domains
17 have been accounted for, and the terms of the Preliminary Injunctions with respect to
18 these nine domains have been satisfied.

19 I certify under penalty of perjury that the foregoing is true and correct.

20 Executed this 4th day of April, 2024, at Woodland Hills, California.



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23 SANDRA CALIN, Declarant
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CERTIFICATE OF SERVICE

I am employed in Los Angeles County, California. I am over the age of 18 and not a party to this action; my business address is 21860 Burbank Blvd., Suite 370, Woodland Hills, CA 91367. My email address is ynelson@kdeklaw.com.

I certify that on April 4, 2024, I served: **DECLARATION OF SANDRA CALIN REGARDING TRANSFER OF THE NINE “ICELANDIC DOMAINS”** on the following parties or counsel of record as follows:

LAWRENCE HINKLE (SBN 180551) STEPHANIE JONES NOJIMA (SBN 178453) JOSHUA ROY ENGEL SANDERS ROBERTS LLP 1055 West 7th Street, Suite 3200 Los Angeles, CA 90017 Telephone: (213) 426-5000 - Facsimile: (213) 234-4581 E-Mail: lhinkle@sandersroberts.com ; sjonesnojima@sandersroberts.com ; jengel@sandersroberts.com ;	<i>Counsel for Plaintiffs</i>
Justin Kian, Esq. J.T. Fox, Esq. LAW OFFICES OF JT FOX, APC 556 S. Fair Oaks Avenue, Suite 444 Pasadena, California 91105 Telephone: (888) 750-5530 - Fax: (888) 750-5530 Email: jt@jtfoxlaw.com ; justin@jtfoxlaw.com	<i>Co-Counsel for Defendants</i>

By ECF/CM: I electronically filed an accurate copy using the Court's Electronic Court Filing ("ECF") System and service was completed by electronic means by transmittal of a Notice of Electronic Filing on the registered participants of the ECF System.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct. Executed at Santa Clarita, California on April 4, 2024.

/s/ Yolanda Nelson

Yolanda Nelson

<https://kdekllp.sharepoint.com/sites/LACASES/Shared%20Documents/LACASES/66/6604/PLEADINGS/Motion%20Re%20Sanctions%203-18-24/Declaration%20of%20Sandra%20Calin%204-4-24.docx>